

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: Keith Damien Johnson Melissa Ann Johnson	§ § § § §	CASE NO: 20-31835-H2-13 CHAPTER 13
--	-----------------------	---

**NOTICE OF FEES DUE PURSUANT TO FIXED FEE AGREEMENT FOR RESPONSE
TO TRUSTEE'S MOTION TO DISMISS**

TO THE HONORABLE JUDGE OF SAID COURT:

Kenneth A. Keeling, Counsel for debtor(s), entered into a fixed fee agreement for the representation of the debtor(s). This agreement was approved by the Court's Order at Docket No. 5.

1. Kenneth A. Keeling, or an attorney in his office, has filed a response to the Trustee's Motion to Dismiss filed on January 26, 2021 at Docket No. 59 in Debtor(s) bankruptcy case.
2. The first hearing date was more than 120 days following the confirmation of the plan. Kenneth A. Keeling has not been paid directly by Debtor(s) for this work.
3. Therefore, Kenneth A. Keeling should be paid \$275.00 by the Chapter 13 Trustee through the confirmed plan.

March 2, 2021

Respectfully submitted,
KEELING LAW FIRM

/s/Kenneth A. Keeling
Kenneth A. Keeling; TBN 11160500
Yolanda Gutierrez; TBN 24041028
Cristina Rodriguez; TBN 24049980
Rebecca Keeling; TBN 24083295
3310 Katy Freeway, Suite 200
Houston, Texas 77007
Tel: (713) 686-2222; Fax (713) 579-3058
legal@keelinglaw.com

CERTIFICATE OF SERVICE

I hereby certify a true and correct copy of the foregoing has been served either electronically or by United States First Class Mail on this March 2, 2021 to the following parties and the affected creditors listed below:

UNITED STATES TRUSTEE

United States Trustee
515 Rusk, Ste. 3516
Houston, TX 77002

CHAPTER 13 TRUSTEE

William E Heitkamp
9821 Katy Freeway, Suite 590
Houston, TX 77024

DEBTOR(S)

Keith Damien Johnson and Melissa Ann Johnson
25507 Holly Springs Place
Spring, TX 77373

Respectfully submitted,
KEELING LAW FIRM
/s/ Kenneth A. Keeling
ATTORNEY FOR DEBTORS